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July 6, 2004

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VIA HAND DELIVERY

Mr. Bruce Duke, Executive Director
 Public Service Commission of South Carolina
 Saluda Building
 101 Executive Center Dr., Suite 100
 Columbia, SC 29210

Re: TRO Arbitration – Docket No. 2004-0049-C

Dear Mr. Duke:

On behalf of Verizon South, Inc., ("Verizon"), I am filing a Motion for Extension of Time to file prefiled testimony in the above referenced docket. As referenced in the Motion, an extension of time will allow Verizon to file a shorter revised TRO amendment consistent with the D.C. Circuit's mandate issued on June 16, 2004 in *United States Telecom Association v. FCC*, 359 F.3d 554 (D.C. Cir. 2004). Given the looming deadline to prefile testimony next week, I respectfully request that you place this matter and Motion before the Commission tomorrow so that all parties will be afforded an early opportunity to be informed about the Commission ruling on the Motion.

Thank you for your assistance in this urgent matter.

RICHARDSON, PLOWDEN, CARPENTER & ROBINSON, P.A.

With Best Regards,


 Steven W. Hamm

SWH/ceb

cc: Parties of Record

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**BEFORE THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Petition of Verizon South Inc. for
Arbitration of an Amendment to Interconnection
Agreements with Competitive Local
Exchange Carriers and Commercial Mobile Radio
Service Providers in Rhode Island Pursuant to
Section 252 of the Communications Act of 1934,
as Amended, and the *Triennial Review Order*

Docket No. 2004-004 -C

VERIZON SOUTH INC.'S MOTION FOR EXTENSION OF TIME

Verizon South Inc. ("Verizon") respectfully moves for an extension of the filing dates and hearing date established in the Commission's June 30, 2004 Letter to the Parties of Record and Notice of Hearing, which required pre-filing of testimony to begin on July 14, 2004 and set a hearing date of August 18, 2004.

In support of this Motion, Verizon respectfully states as follows:

1. On June 16, 2004, the D.C. Circuit's mandate issued in *United States Telecomm Association v. FCC*, 359 F.3d 554 (D.C. Cir. 2004). With the issuance of the D.C. Circuit's mandate, Verizon will be able to substantially simplify its proposed TRO Amendment. Verizon anticipates filing a shorter, revised amendment with the Commission within the next few weeks. Verizon anticipates that the arbitration could then proceed forward on the basis of that shorter, revised amendment, reducing the burden on the Commission and the parties.

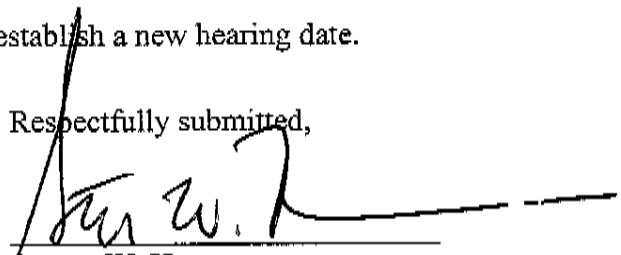
2. It would be in the interest of all parties and the Commission to provide CI ECs with at least two weeks to review Verizon's revised TRO Amendment and to make known to Verizon any proposed changes to that revised amendment, as well as to work with Verizon in an attempt to agree upon a list of open issues prior to starting the process of submitting pre-filed

testimony. Verizon does not oppose a corresponding extension of the deadline for resolving this arbitration to accommodate this extension of the procedural schedule. Once Verizon files the revised amendment it will confer with the CLECs and submit a further motion asking the Commission to establish a date certain for starting the process of submitting pre-filed testimony.

3. Counsel for Verizon has attempted to confer with counsel for the other parties to this arbitration and the holiday schedule surrounding the 4th of July has made contact difficult in light of the compressed schedule announced by the Commission.

WHEREFORE, Verizon South Inc. respectfully moves for an extension of time to allow it to file a revised proposed TRO Amendment and to allow sufficient time for the parties to begin filing pre-filed testimony and to establish a new hearing date.

Respectfully submitted,



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July 6, 2004